

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
JACKSON DIVISION
CASE NO.: 1:23-cv-001143

PUCKETT ET., AL.

PLAINTIFFS

v.

JABBAR ET., AL

DEFENDANTS

RECEIVED

SEP 25 2023

Wendy R Oliver, Clerk
U.S. District Court
W.D. OF TN, Jackson

**PLAINTIFF'S MOTION FOR LEAVE TO FILE A CORRECTED
RESPONSE AND OPPOSITION TO "PRO-SE" DEFENDANT GUERRA'S
MOTION TO DISMISS COMPLAINT AND PURSUANT TO LOCAL
RULES OF COURT 12.01 TO EXTEND THE LENGTH OF RESPONSE IN
OPPOSITION TO 30 PAGES EXCLUDING THE ADDENDUM TO
APPENDIX "E" OF EXHIBITS.**

Comes now, Plaintiffs , Carl and Marcella Puckett "Pro-Se", do hereby Move this court for leave to extend the limit of pages in a corrected response and opposition to the RICO defendant Guarra's MOTION TO DISMISS. The motion for leave to file a corrected opposition and to extend the page limits of the response opposition is brought forth in accordance with the local rules of court 7.2 (1)(b) requiring parties to meet and confer. Plaintiff shared their intention to bring forth this motion with RICO Defendant's Milbrath and Guerra via email on 9/20/23.

“Pro-Se” RICO defendants Milbrath and Guerra oppose the motion. “Pro-Se” defendant Richard Guerra responded with no objection and “Pro-Se” defendant Milbrath has not responded. The Response in Opposition to “Pro-Se” defendant Guerra’s Motion to dismiss will consist of no more than thirty pages corresponding to Appendix “E” of exhibits already on file in this case and an addendum to Appendix “E” consisting of 6 pages or less.

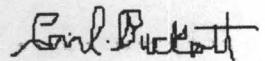
The Motion complies with Local Rules of this Court 12.01(b). The extension of page total is necessary as Plaintiff’s inadvertently printed out the wrong and improperly spaced version of their response which does not meet the standards for submission to the court and the filing of a corrected version with a granting of the motion to extend the number of pages would ensure the Plaintiff’s can fairly and fully be heard before the court in this matter. The Plaintiff’s corrected response will not only meet the appropriate standards but be submitted within the appropriate time allowed by statute for responding to the “Pro-Se” RICO defendant Guerra’s motion filed on September 15th, 2023 with opposition due by October 13th, 2023 the time permitted by the Local Rules of court 12.01(b).

WHEREFORE, for the reasons as stated herein the Plaintiff’s request the court to find a showing of good cause and grant the extensions of page limit excluding an appendix of exhibits, for the Plaintiff’s response in opposition to “Pro-Se” RICO defendant Guerra’s Motion to dismiss due before this court by 9/15/23. Executed

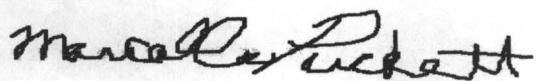
this 20th day of September 2023.

Respectfully Submitted,

September 20th, 2023



Carl Puckett Plaintiff "Pro Se"



Marcella Puckett Plaintiff "Pro-Se"

Certificate of service

I Marcella Puckett, do hereby certify that on September 20th 2023 that the Foregoing Motion including this certificate of service was emailed to Defendant Stephen D Milbrath at smilbrath@acceliplaw.com and rguerra@brickellip.com a true and correct copy with prepaid postage attached thereto was then placed in the United States Mail in Martin Tennessee and addressed to Defendant Stephen S. Milbrath Orlando Area Office at 307 Cranes Roost Blvd, Ste. 2010, Altamonte Springs, Fl. 32701 and to Defendant Richard Guerra 1101 Brickell Avenue, South Tower ste 800, Miami Florida 33131. I declare under penalty of perjury that the foregoing is true and correct Executed in Martin RTennessee on this 20th, day of September 2023.

Marcella Puckett

Marcella Puckett